

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

-against-

CHUCK CONNORS PERSON and RASHAN MICHEL,
Defendants.

17-CR-683 (LAP)

**NOTICE OF JOINT
MOTION TO SUPPRESS
WIRETAP AND
CELL PHONE EVIDENCE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and exhibits attached hereto, Defendants Chuck Connors Person and Rashan Michel, by their undersigned attorneys, shall move before the Honorable Loretta A. Preska, United States District Court for the Southern District of New York, at the U.S. Courthouse located at 500 Pearl Street, New York, for an Order granting Mr. Person and Mr. Michel's Motion to Suppress (1) all communications intercepted pursuant to orders issued on December 9, 2016, January 9, 2017, January 26, 2017, February 10, 2017, April 27, 2017, and May 25, 2017; (2) all material obtained from the search of Mr. Person's and Mr. Michel's cell phones pursuant to warrants issued on November 3, 2017 and November 6, 2017; and (3) all evidence derived therefrom; as per the following schedule set by the Court:

- Defendants' motions shall be filed on or before April 30, 2018;
- The Government's response, if any, shall be filed on or before May 30, 2018;
- Defendants' replies, if any, shall be filed on or before June 13, 2018.

Dated: New York, New York
April 30, 2018

Respectfully submitted,

/s/ Theresa Trzaskoma

SHER TREMONTE LLP
Theresa Trzaskoma
Michael Tremonte
Michael W. Gibaldi
Emma Spiro
90 Broad Street, 23rd Floor
New York, New York 10004
(212) 202-2600
ttrzaskoma@shertremonte.com

Counsel for Chuck Connors Person

/s/ Jonathan Bach

COOLEY LLP
Jonathan Bach
Reed Smith
Kaitland Kennelly
1114 Avenue of the Americas
New York, New York 10036
(212) 479-6000
jbach@cooley.com

Counsel for Rashan Michel